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BEFORE THE

DEPT. OF TRANSPORTATION

DEPARTMENT OF TRANSPORTATION

98 400 - 3 AM 9: 26

WASHINGTON, D. C.

Joint Application of

UNITED AIR LINES, INC. and DEUTSCHE LUFTHANSA, A.G. (LUFTHANSA GERMAN AIRLINES)

for approval of and antitrust immunity for an expanded alliance agreement under 49 USC 41308 and 41309

OST-96-1116 -/O

ANSWER OF AMERICAN AIRLINES, INC.

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April 3, 1996

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ANSWER OF AMERICAN AIRLINES, INC.

American Airlines, Inc., pursuant to Order 96-3-26, March 13, 1996, hereby answers the joint application of United Air Lines, Inc. and Lufthansa German Airlines for approval of and antitrust immunity for an expanded alliance agreement.

On November 3, 1995 -- almost four months before United and Lufthansa filed their application on February 29, 1996 -- American and Canadian Airlines International, Ltd. submitted an application for approval of and antitrust immunity for a similar alliance agreement (OST-95-792). Moreover, on September 8, 1995 -- almost six months before United and Lufthansa filed -- Delta Air Lines, Inc. and its partners Swissair, Sabena, and Austrian Airlines submitted an application for approval of and antitrust immunity for their alliance agreement (OST-95-618).

In these circumstances, it would be contrary to fair and orderly administrative procedures to move forward with the United/Lufthansa application until the Department has acted on the long-pending American/Canadian and Delta/Swissair/Sabena/Austrian applications. Surely United and Lufthansa should be required to wait their turn in the administrative process, and not jump ahead of other carriers that filed applications for similar relief many months ago.

The American/Canadian application is more worthy of approval than the United/Lufthansa request based on actual marketplace competition. The U.S.-Canada market is far more competitive than the U.S.-Germany market, which is dominated by Lufthansa. Lufthansa and its affiliates hold a 33.5 percent share of U.S.-Germany nonstop weekly frequencies, and -- as will be shown below -- Lufthansa participates in a number of exclusionary tactics to prevent effective CRS competition in Germany. The frequency share of Lufthansa and United combined is 40 percent. With the exception of Delta, none of the other 12 nonstop carriers in the U.S.-Germany market has a share exceeding 8.7 percent. See Attachment 1.

In the U.S.-Canada market, by contrast, the nonstop transborder frequency share of American and Canadian combined is 14 percent. Air Canada has the largest share, at 24.8 percent, followed by 31 carriers with shares ranging downward

from 8.6 percent. See Attachment 2. The U.S.-Canada market is fiercely competitive, and is becoming more competitive as new services are added by the carriers of both countries under the liberalized agreement.

Once approval of the American/Canadian application has occurred, the Department should approve the United/Luft-hansa application only after Lufthansa has agreed to discontinue the various practices which have prevented effective distribution competition in Germany.

As the Department has long been aware, overtly discriminatory and anticompetitive distribution practices by carriers and travel suppliers affiliated with the Amadeus CRS¹ have been a constant problem since American began marketing SABRE in Europe some 10 years ago. SABRE's market share in Amadeus countries is less than half of SABRE's share in comparable European markets, and proves beyond doubt that this discrimination has been effective.

Germany is by far the largest home market in which Amadeus operates. Within Germany, Amadeus is marketed by a company known as Start, which is jointly owned by Lufthansa, German Rail, and TUI (the largest German tour operator). Through cross-ownership and other affiliations, Lufthansa has

^{&#}x27;Amadeus is jointly owned by Lufthansa, Air France, Iberia, and Continental.

orchestrated a concerted effort that has had the effect of keeping the largest tour companies out of SABRE, and of minimizing participation in SABRE by German charter carriers.

Lufthansa has also refused to provide important functionality to SABRE to offer a full range of services to frequent flyers and business travelers, thus precluding airlines other than Lufthansa/United, and CRSs other than Start/Amadeus, from competing effectively in the German market.

• Tour Companies. Access to tour companies is essential to German travel agencies. Unlike Americans, most Germans use a tour company when traveling for leisure. Many of the major tour companies in Germany, including TUI (by far the largest), LTU, Der Tours, and Ameropa, are owned in whole or in part by one of more companies affiliated with Start and Amadeus. None of these tour operators has signed agreements with SABRE. SABRE has been pursuing TUI for five years, and has no prospect of being able to distribute TUI in the near future.

Indeed, TUI executives recently advised SABRE that, in order to protect Start/Amadeus market share, they had decided not to make TUI available through any system other than Start/Amadeus. Some 4,000 travel agencies in Germany --

²We note that NUR, the second largest tour company in Germany, is not affiliated with Amadeus, and does participate in SABRE.

accounting for nearly half of all travel agency locations -distribute TUI products. Because of contractual commitments
with TUI, these agencies are precluded from selling NUR,
Germany's second largest tour company, meaning that these
agencies must have a system that provides access to TUI. This
huge segment of the market is not likely to use SABRE unless
SABRE can distribute TUI.³

Moreover, as shown by Attachment 3, recent reports in the German travel press regarding TUI's refusal to distribute its products through any CRS other than Start/Amadeus strongly suggest that TUI's boycott of SABRE is part of a <u>auid pro quo</u> with Lufthansa for a reduced fee for bookings in Start/Amadeus:

"TUI, DB [German Rail], and Lufthansa could only come to an agreement after tough rounds of discussions within the board of directors. The strenuous compromise, which resulted particularly after considerable concessions of Lufthansa, could be brought off balance. It could have been that the SABRE options had exercised certain pressure on Lufthansa to

³The exclusionary tactics now being used by TUI were also used by German Rail, a co-owner of Start along with Lufthansa and TUI. German Rail had allowed access to its services only through Start/Amadeus, and refused to participate in SABRE. This discriminatory practice helped Start/Amadeus achieve a 90 percent share of the CRS travel agency market in Germany. On March 24, 1995, SABRE filed a complaint against German Rail with the German Cartel Office. Following an investigation by the Cartel Office, in January 1996 German Rail provided the Cartel Office with a commitment of undertakings to participate in SABRE. SABRE is currently working with German Rail to finalize that commitment.

agree to their concessions. TUI however emphasizes that their main interest is to protect START."

In these circumstances, it would clearly be contrary to the public interest for the Department to grant antitrust immunity to any arrangement involving Lufthansa until these matters have been resolved.

- Charters are very important to the Charters. leisure travel market in Europe, particularly in Germany. As much as 30 percent or more of airline bookings in Germany are on charters, and in some cities, such as Munich, charter flights may outnumber the flights of full service scheduled carriers. Some charter carriers also operate regularly scheduled flights and make limited seats available to last minute travelers. As with the tour companies, many of the largest charter carriers in Germany are affiliated with Start, Amadeus, or their affiliates. These include Hapag-Lloyd (the third largest German charter carrier), which does not participate in SABRE at all, and Eurowing (the fifth largest), which participates at a materially lower level in SABRE than it does in Start/Amadeus.
- Missina Functionality. Through Start/Amadeus,
 Lufthansa provides special privileges to its most valued frequent flyers, such as seating preferences, wait list priority,
 class of service upgrades, and ticketless transactions. This

is very important CRS functionality, particularly for travel agencies that serve business travelers. Lufthansa could provide this functionality to SABRE through a variety of technical solutions, but has refused to do so. In addition, many business travelers in Germany purchase "tickets on departure" (TODs), which they can pick up at the airport counter. In Germany, Lufthansa provides this important functionality only through Start/Amadeus, even though Lufthansa allows SABRE to issue TODs in the United Kingdom.

As shown above, Lufthansa is engaging in a number of discriminatory and anticompetitive practices with respect to SABRE in Germany. It would be contrary to the public interest for the Department to approve the United/Lufthansa application until these practices have ceased, and SABRE is finally allowed to compete effectively in the German market.

Respectfully submitted,

CARL B. MEDON,

Associate General Counsel American Airlines, Inc.

April 3, 1996

U.S. - Germany Market Share Nonstop Weekly Frequencies

		Operated Roundtrip Free	Roundtrip Frequencies 1/	
LH, United and Affiliates	Lufthansa	105	32.5%	
	Condor	0.5	0.2%	
	Lauda	3	0.9%	
Total		108.5	33.5%	
United		21	6.5%	
LH, United and Affiliates Total		129.5	40.0%	
Delta		77	23.8%	
USAir		28	8.7%	
American		21	6.5%	
Northwest		15	4.6%	
Continental		14	4.3%	
LTU		13	4.0%	
World		a	2.5%	
TWA		7	2.2%	
Singapore		4	1.2%	
Air New Zealand		3	0.9%	
PIA		3	0.9%	
Kuwait Airways		1	0.3%	
Grand Total		323.5	100.0%	

I/Totals may not add due to rounding.

2/ Round robin Frankfurt - San Juan - Antigua - Frankfurt.

U.S. - Canada Transborder Market Concentration
Before and After Alliance

Rank	Operating Carrier	Frequency Share Before	HHI Score	Frequency Share After	HHI Score
1	Air Canada	24. 84%	Before 616. 80	24. 64%	After 616. 60
2	American	8.59%	73.71	a0096 1 /	0.00 1/
3	Business Express 2/	6. 86%	47. 27	6. 86%	4727
3	Northwest	6. 86%	47. 27	6. 88%	47.27
5	Delta	6. 45%	47. 27	6. 45%	47. 27
6	United	5.69%	32.39	_ 5.69%	32.39
7	Canadian	5.43%	29.46	1401% 3/	196. 37 3 /
8	USAir	4.93%	24.35	4. 93%	24. 35
a	Horizon 2/	4.93%	24. 35	4. 93% 4.93%	24. 35 24. 35
10	Air Ontario 2/	4.54%	20. 61	4.54%	24. 33
11	USAir Express 2/	3.98%	15.84	3.98%	15.84
12	Air BC 2 /	2. 60%	. 6.75	2.60%	6. 75
13	Comair 2/	2. 43%	5. 93	2. 43%	5. 93
14	Flagship Airlines 4/	2. 30%	5. 30	230%	5. 30
15	Mesaba 2/	1.97%	3. 90	1.97%	3. 90
16	Air Alliance 2/	1.02%	1. 04	1. 02%	1.04
17	Air Nova 2 /	0.95%	0. 91	0. 95%	0.91
18	Kenmore Air Harbour	0.69%	0. 46	0. 69%	0.48
19	Ontario Express 5/	0. 66%	0. 43	0. 66%	0.43
19	Time Air 5 /	0. 66%	0. 43	0. 66%	0.43
21	Air Atlantic 5/	0. 63%	0. 39	0. 53%	0.38
22	America West	0. 46%	0. 21	0. 46%	0.21
22	Continental	0. 46%	0. 21	0. 48%	0. 21
22	Reno Air	0. 46%	0. 21	0. 46%	0.21
2s	Midwest Gpress	0. 39%	0. 16	0. 39%	0. 16
26	Skyway Airlines 2/	0. 36%	0. 13	0. 36%	0.13
27	British Airways	0. 23%	0.05	0. 23%	0.05
26	Alr North	0. 20%	0.04	0. 20%	0.04
29	Athabaska Airways	0. 13%	0.02	0. 13%	0. 02
29	Columbia Pacific	0. 13%	0.02	0. 13%	0. 02
31	Royal Air Maroc	0.10%	0.01	0. 10%	0. 01
32	Taquan Air Service	0.03%	0.00	0.03%	0.00
	Total	100%	1,000	100%	1,093

Change In HHI Score

^{+93 +9.3%}

^{1/} American and Canadian combined below.

^{2/}Regional airline partner of non-alliance carrier(s).

^{3/} American and Canadian combined.

^{4/} Regional airline partner of American.

^{5/} Regional airline partner of Canadian.



A.7 ZEI UNG FOR DIE DEUTSCHE TOURISMUSWIRTSCHAFT

Ul-Buchungszulage ndlich mai nici ts u meckern?

coltive Resistance sus d: Reisero-Vertrieb orthe TUT-Vott: 1d Norre Minnech, well start Roug! Preisen
2c eine Buchungstuluge für; 2 Kans1 und Griechenland das bir: 1g flaue
1 und Griechenlan

-Medienkongreß ne Auffahrt be: en

th ist das Internet mehr H: crweg vielen Ampeln und Sta: denn tr Information Highway. D: judes shiro sollte sich eine eig: : Auftbeuen, weil die Kunden e: tur so en werden. Das Marketing: : dzum cheldenden Erfolgsfakter, : Thehselber steht bereit, ist sich : I und ich für das einzelne Unter: hmen wrichten.

psuschairelse 1995 utsche Carrier nit hn Prozent Piu

Plugnauchelreisemerke is: 1993 weiselch um übet zolln Prote i gasen. Dies erglist die Addit i i der is veröffentlichten Panngie inlan eutschan Ferien- und Char i flugscheften. Die von der ADV i den halfingverleihr ermittelten i blen en liefe realledsches Bild et er, du roden Certer inswischen ! Lingdus operieren. i ite 5

Amadeus-Eigentümer müssen der Allianz mit START zustimmen

Sabre droht TUI mit Kartellamt

FVW 15. 3. 96. Die Abangs der Tüll crwischte Sabre wie eine eiskalte Dusche.
Während der ITB tellte Tüllichef Dr. Reif Corsten Sabres Spitzennsann in Europa, Frin Speck, mit,
daß sich nie Tüll nicht dem Virrtrob über weitere CNS öffnen werde.
Diese Emscholdung soll die START-Amadeus-Allianz zubtzen.

ABR Etose ledninys

MARKET

Nach harton Verhandlungen einigten

sich 11/1, DB unti Lfl auf die Amadeus-

START-Allenz und deron Monditionen

abre night dernit die eigenen hochsliegenden Plane, in Deutschlend tourtstische Reisebüros als Kunden zu gevinnen, mißhtäuchlich ausgebremst und will die Haltung der

TVI larretterheliets
übernrufen lassen Der
DB het Sehre auf diesem Weg bezeits eine Öffinung für weirere Systeme abgerungen, Beim Bunder-

karutlarnt wird nun die Frage zu enucheiden sein, oh die starke Marksnellung der TUI mit der Munupolitellung der DB vorgleichbar ist und das TUI-Verhalten deshalb als Mißbrauch gewertet werden muß. Pür die TUI scheint die Utt-

nung file Sobre und andere START-Werchewerber aus zwei Gründen nicht angetagt, die
beide aus der Einigung über die Alliaux mit
Amedeus einem Vertriebeweg ins europäische
Ausland, denn Berandtzeil der Alliaux ist die Integration von werendlichen START-Funktionalitäten in das Amedeus-System, Die Notwendigkeit, den Weg iller andere Systeme au gehen, wird zumändere in Ländere mit serker
Amadeus-Präsenz überstässig. In Ländere mit
sehwecher Präsenz ist das Tandett STARTAusdeus geforden, Marktantzile zu er-

Pamadeus unternahmenspolitischer Norve Noch sähem Ringen im START-

Aufsichtungt hahen sieh TUI, DB und die Lufthanse auf die Konditionen der Allienz geeinigt. Dieser mühevolle Kompromiß, instessondere nach inheltlichen Zugeständnissen der Lufthausa, könnte aus der Balance gereten. Schileßlich dürfte die Sobre-Option einen gewissen Druck auf Lufthaure ausgeübt haben, bal den Konditionen nachzugeben. Aus der Sicht der

von START im Auge habe.
Die Alliene verbledet START und
Amedeur auf vier Ehenen. Der
Streitpunkt Auslandeverwich wird
zue dem Weg gertumt, indem

TUI wird jedrich betout, das men

in croser Line die Absicherung

Amedeus den internationalen Verrieb übernimmt, einsel-ließlich der auslandischen
START-Töchter. Die START-Geräte im Auslend bleiben jedoch besechen. Die technische
Etnnichtung und Anbindung an des STARTSystem wird sogar euf weitere Länder zum Bulspiel in Ostenings ausgedahnt. Amedeus hat im
Verfuld hereies bekonder, deß men die Vorzeile
von START voll nutzen wolle. Die vergleichsweise schneil eingerichteten Anschlüsse an
START könnten sogat in Großbritennien die
Ansdeus-Position verbeszern helfen.

lands for while worker and marks 4



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woires Kornelement der Allunz hildet is START-Funktionalität als integralet il des Amadeus-Systems. Die Non-terfahren bis hin zum Rockoffee im ART-Modus sollen internationalität et und über Amadeus vermarktet wert it (siehe S. 23).

Uns diese Anpassungen und weitere wieldungsarbeiten im Amadeus-Verti id zu verenkern, wird Amadeus mit Prozent an der START Informank inligt. Gleichzeitig sollen Kompestischenflikte nich dem Amadeus-Sorten in 1-House vermieden werden. Putikt v.: der Allianz ist das START-Rechenzu rum. Es bleibe in Frankfurt, solange ein Trausfer in das Amadeus-Rechenzum nach Erding nicht dauerhalt w. chaftliche Vorseile gerantiert.

UI und DB beben sich ausbedunget imf Deuer entscheidenden Einfluß est is START-Funktionalitzten zu belitzt z. »Wir wollen netärlich nicht, daß da was entwickelt wird, was sich in De: schland überhaupt nicht vermerkten lissu, begründer DB-Vorwand He! Neuhaus, Errelche werden soll das dem die Entwicklungskomperenz bei: ART in Frankfurt bleibe.

as Vereinberungen wird LH-Vorster Hemiß Klein, der gleichzeitig im ST7) I- und im Amedeus-Aussichtene egenührt den weiteren Ausdeus-Bige: Amerik vertreten. Der Amedeus-Von: id hat Elnvertändnis eignelleiert, im /: ideus-Aufsichtenet im den Oh und das 1 nn wieder unsleher, denn die Air Fran: sehickt neue Vertreter Des könt: den Abschluß verzögern.

K . pflos will Sobre some Deutschland : He jedoch Hicht sufgeben. Vice Presi I se Eric Speck will alle justisescher. Uttet swechüpfen. Neben der Opne: Burdeskartellami werden Anwithin the chief EV-Openies profess. Um den V: mitenekodex für CRS und deren Eigen i ner hergneichen zu können, sind i hrere Pregen zu klären: Ist STAR! win CRS im Sinne der EU-Regeln, et e wird es durch die Allietz demi? G: at die Nachtellenthinierungsvorsch : en aus für Airlines als Eigennümer, ol ist der Begriff zu erweimm' Schhil ich has Dr. Comich nutgeteilt. man es se bes dieser Enucheldung nicht il Veremoelten dei nicht Verwiebsb: : z suche, sondern mehr aus der Sight in Reservierungssystemsen, berichtet : c Spack.

ITB 1996 mit Rekordzahlen an Ausstellern und Besuchern

Als dynamische Branche emeut bestätigt

FVW 15. 3. 96. Die IT6 hat eich erneut als Stimmungsberometer der Internationalei faurismuswirtschaft bestätigt, erklärte Dr. Manfred Bueche, Vixeltzender der Geschäftsführung Mosse Berlin. Eine Umfruge ergab, das 1:4 Prozent der Ausstaliei die derznitige wirtschaftliche Skuation als günetig bis sohr günstig bewerten.

VOR KARIN LINONER

Sehr gut akzeptiert wurde nach Angeben von Dr. Busche der Kongreß willektronik in der Touristike. Ale positiv wurde auch hewerten, daß erstmals eine separate Multimedia-Halle zu-Vorfügung stand. Bestädge habe eich auch des Konacpa des Wissenschaftszengums als Vermittler zwischen Theorie und Presis. Der Wissenschaftspreis habe sich eines großen Interesses erfreut und soll wiederholt werden. Die übergreifenden Themen werden 1927 aMaeketing im Toutismuse und 1998

ITB größer als im Vorjahr Neue Rekordzahlen bestätigen Erfolg

FVW 15, 3, 96. Die 178 1996 wartele crosus mit Rekordzahlen auf. Auf grö-Bomi Ausstellungsfläche wagen mehr in und ausländische Unternehmen und Länder vortreten als im Volleix. Die Deten (im Versieich zu 1995): Bruttelliche: 103 000 qm (175 000 qm) Nattohiche: 64 963 cm (80 529 cm). devon 30 769 om (plus kyche Prozem) en ausländische, 25 110 em (blus elf Prozenti en inlândische Aussteller Zahl det Ausstalier gounnt: 6125 (5283), 148 zusätzlich vertratene Fin men und Urganisationen (298) Aucatolian Island: 1274 (1200) Australia Australia 4851 (4053) Lander und Regionerii 176 (173) Eustorializane Georgien Wiederbetelligung: Guerri, Haiti, Kroa tien, Serbian, Monaco Kaine Telinghme 1830: Eritica, Gabuh Besychen 120 000* (118 644) Panhaeueher: 80 000* (52 000) Bleker 12, Mary 1996

*EDV-Einsetz im Tourismus« sein. Große Beachnung habe such das Thems Umwelt gehinden. Die Verlinderungen in der Iburismuspolitik und des resulcorende Kunzept sowie die Meßnah men der DZT hätten in Jes Tourismus. wit weltaft und bei den Verbinden große Resouanz hervorgernfen, so DKV-Prissident Gerd Hoselmann zum DZT-Incoming-Tag. Bedsustlich sei ellerdings, dad die DZT ihre gute Markedingarbeit immer wieder sellier demonnorg, -Su können wir night weiterzeitene, meint Henelmann Keink wurde un Literaturforum gelüßert, das im kom-Dichden lahr Verbenart werden soll.

Mie schon in den Verfahren hat die Merse Hortin eine Befragung deren ein unabhängiges Merkeforschungsinsunst durchführen tessen. Dansch heben 44 Prozent der Aussteller während der ITB Geschäftsabschlüsse getitigt Aufgrund die er Kontakte einenten 36 Prozent der Aussteller ein gutes Nachmesseguschäft, Geschäftskunden selen vor allem Fachleure aus Deutschland (44 Prozent) vor jenen ein den Europa gewesen. Mircel- und Osteuropa gewesen. Merse-Eindruck von der ITB, 96 Prozent der Aussteller hetten einen porsieven Messe-Eindruck von der ITB, 96 Prozent wollen 1997 wiederkommen.

Erva 93 Prozent der Privathenscher der ITB wollen 1996 mindestens eine Urlaubereise unternehmen, wohel für 69 Prozent das Urlaubesiel für den Haupturlaub fermucht. Ihre Reiseziel-Einscheidungen werden zu 49 Prozent äber Veranstalter-Kaulogu, zu 41 Prozent zuf Touristik-Messen und zu 40 Penzont enhand von Reiseführem und büchern gustoffen. Die ITB 1997 findet vom 8. ble 12. März sent. Der Fachbenscherung wird such im kommenden Jahr wieder zur Montag durchgeführt. Ei bleibt auf einen Tag beschrinke. Neur

(TRANSLATION)

Ani Ideus Owners must agree to the START Alliance

S. BRE threatens TUI with the Kartellamt

FV 1.15.3.98 TUI's refusal had the effect of a cold shower for SABRE. During the FB, TUI executive Or. Relf Corsten informed top SABRE man in Europe, Eric Spilk, that TUI will not open itself to others. CRSs This decision is intended to sur port the START- Amadeus Alliance.

SA! RE sees its own ambitious plans to win touristic travel agencies in Ge. nany unjustly stopped, and will undertake investigative steps on the position of TUI with the Kartellamt. In the same manner, SABRE has already for: d an opening of the local rail DB. The Kartellamt will have to ask the question now if the strong TUI market position can be compared with the most poly position of the Deutsche Bahn, and whether for that reason TUIs beliviour can be considered an abuse. For TUI, their opening up to other CR: it is not feasible for two reasons, which both resulted out of the agreement of their alliance with Amadeus.

For ne, the alliance with Amadeus means a marketing channel for TUI in the oth: European countries, since a part of the alliance is the integration of ST. IT functionalities into the Amadeus system, The necessity to distribute three ghother systems will become superfluous, at least in those countries with a strong Amadeus presence. In those with a weak representation the ST. IT-Amadeus tandem will be forced to win over market shares.

The second reason is more of a business nature TUI, DB and Lufthanso cou only come to an agreement after tough rounds of discussions within the bon of directors. The strenuous compromise, which resulted particularly after considerable concessions of Lufthansa, could be brought off balance. It con have been that the SABRE options had exercised certain pressure on Luf I ansa to agree to their concessions. TUI however emphasizes that their mail interest is to protect START.

ST : RT and Amadous alliance encompasses four areas.

Int: nationally Amadeus takes charge of the marketing and sales for the: selves and their subsidiary START, thus making void of the issue of sal: in foreign countries.

ST'RT equipment in those foreign countries will be kept however. The tec: ucal setting-ups and connections to START system will even be ext: ided to further countries such as those in Eastern Europe. Amadeus had dec! red that all of START assets will be used to their full extent. The reli vely short time frame for a START installation might result in a stronger An: deus position in Great Britain.

The second area of alliance is the integration of START functionalities into the unadeus system. From non-air procedures to back office system in ST.! RT mode, Amadeus wants to go international and will market the pro. icts.

In a rder to establish ground to the adaptation process and further development works needed within the Amadeus group, Amadeus will take up 50% i shares in WART computer studies. By the same token, this step will soft: 1 up any competition issues with the Amadeus software house.

The fourth area of the alliance is START main data base. It will stay in Fra: I furt as long as the transfer to Amadeus data base in Erding not prove to gua interpretament economic advantages.

TU: and DB had reserved themselves the right to have, a saying in the dec: on making process of any START functionality. "WC do not wish to hav anything developed in Germany that cannot be marketed at all" declares DB i frector, Mr. Heinz. Neuhaus. This aim can be reached if the competent dev: opment decision makers do stay in Frankfurt.

LE. Director Hemjö Klein, also member of the Amadeus board of directors. will defend these arrangements in talks with the other Amadeus owners. The Anadeus executive board has consented and signaled that the Ifs and Whens for the Amadeus board of directors have become uncertain, since Air France is anding new representatives. This means a possible delay for an age: ment.

Ye SABRE will not give up its aims in Germany without a fight. Vice Predent Eric Speck intends to use up all legal means. Besides the option of the Cartellamt, other EC options will be revised by lawyers. In order to approach the issue of the conduct code for CRS and their owners, many quesions will need to be raised: is START a CRS according to the EC rules, or is it become one by way of its alliance? Do the non discrimination procedures apply only to the airline owners, or should they not be spread out to a wider range? Eric Speck reports: "Dr. Corsten claimed in the end that this course of action was not done by a tour operator in search of wider sales hor, ont but was rather steered through the look of a computer reservation sys m.".

Art le on front page of magazine FVW International

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing answer by fax on United and Lufthansa, and by first-class mail on all persons named on the service list attached to their application.

Carl B. NELSON, JR.

April 3, 1996